



November 1, 2023

To: All Sports Wagering Class A, B and Supplier licensees

From: Peter S. Alvarado, Director *Peter Alvarado*  
Regulation and Oversight Division  
Office of Lottery and Gaming

Subject: Administrative Guidance  
Funding sports wagers using debit and credit cards

It has come to the attention of the Office of Lottery and Gaming (“Office”) that there is a desire to offer a cashless method for customers to fund their sports wagers at retail locations. Under 30 DCMR § 2126.6(c) debit and credit cards can only be used to fund “online purchases.” The latter is in reference to online sports wagering accounts. The Office recognizes that cashless methods are quickly becoming the more common or preferred method of payment for goods and services. The Office further recognizes the increased regulatory oversight relating to fraud, identity verification, anti-money laundering, and other areas imposed on debit and credit card issuers.

For the reasons cited above, the Office is exercising its regulatory authority to allow sports wagers whether through online accounts or at retail locations (e.g., in-person wagering stations/counters or self-service betting terminals) to be funded using, among other permissible methods, debit and credit cards. The Office is approving these methods of payment under 30 DCMR § 2126.6(f).

If a Class A or B licensee wishes to offer debit or credit card methods of payment as described herein, they must submit a Change of Operations Request Form (attached) to the Office. The submitted Form should also include proposed House Rules that include new methods of payment as required under 30 DCMR § 2116.2(h).

Sports wagering licensees are reminded that regardless of internal controls imposed by debit and credit card issuers, licensees are still responsible to have internal controls that include transaction monitoring to guard against money laundering, fraud or other related crimes. Moreover, if suspicious activity is detected it must be reported to the Office.

If you have any questions, I can be reached at [peter.alvarado@dc.gov](mailto:peter.alvarado@dc.gov).

Enclosures: DC OLG SW- Change of Operations Request Form



### Change of Operations Request Form

Operators and Management Service Providers shall request from the Office of Lottery and Gaming, Regulation and Oversight Division, any changes to their application within ten (10) business days of the change. Type or print (in ink) all information requested on this form. If additional space is needed, please note response on a separate sheet of paper. Send this completed form to: [swreports@dc.gov](mailto:swreports@dc.gov)

Licensee: \_\_\_\_\_

License #: \_\_\_\_\_

License Expiration Date: \_\_\_\_\_

Business/Facility Address: \_\_\_\_\_

Filing Date: \_\_\_\_\_

Effective Date of Amendment(s): \_\_\_\_\_

Email: \_\_\_\_\_

Check appropriate reason(s) for filing below:

Change within the facility: security and surveillance plan (e.g., installation and maintenance of security equipment and surveillance system, storage of equipment, security company/personnel, key control, physical access matrix, server room, cash routes, etc.)

Change of sources of data used to resolve sports wagers (e.g., type of wager and method of data collection)

Change of any feature that allows a user to manually input or override of any wager transaction (remote sports wagering system)

Change to system's risk management framework (e.g., firewall, information security program, access controls for personnel, anti-money laundering program, change to the Geolocation system)

Change of sports wagering equipment and system software used in conjunction with operations (e.g., kiosk, ticket writer terminals, internet and mobile sports wagering system, data feed, betting platform, payment processing, etc.)



Change of internal controls for all aspects of sports wagering (e.g., retail sportsbook operations, mobile APP operations, remote sportsbook wagering operations, house rules, etc.)

Any other changes to the application (e.g., change in ownership/key personnel, entity name change, business mergers, joint ventures, acquisitions, stock sale/purchase, new or terminated agreements, institutional investors, etc.)

Briefly describe below the nature of the change and/or steps taken to remedy a deficiency (attach additional pages, if needed).

**Pursuant to D.C. Official Code § 22-2405, a person commits the offense of making false statements if that person willfully makes a false statement that is in fact material, in writing, directly or indirectly, to any instrumentality of the District of Columbia government, under circumstances in which the statement could reasonably be expected to be relied upon as true. Any person convicted of making false statements shall be fined not more than the amount set forth in D.C. Official Code § 22-3571.01 or imprisoned for not more than 180 days, or both.**

\_\_\_\_\_  
Authorized Person Signature & Date

\_\_\_\_\_  
Authorized Person Printed Name & Position

**OFFICE USE ONLY**

\_\_\_\_\_  
Authorized OLG Representative Signature & Date

\_\_\_\_\_  
Authorized OLG Representative Printed Name